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December 16, 2020

VIA ECF

Hon. Vernon S. Broderick, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 12/17/2020

Re: Stanley Johnson v. M.A.C. Cosmetics Inc.
et ano.
Case No.: 18-CV-09157 (VSB) (SN)

Dear Judge Broderick:

This firm represents Defendants M.A.C. Cosmetics Inc. and The Estée Lauder Companies Inc. (together, "Defendants") in connection with the above-referenced matter.

We write jointly with counsel for Plaintiff Stanley Johnson and the opt-in plaintiffs (together, "Plaintiffs") pursuant to the Court's November 16, 2020 Order (ECF No. 81) to update the Court regarding the parties' anticipated submission of a formal proposed settlement agreement. The parties reached an agreement in principle to settle this matter following good faith and arm's length settlement negotiations at a November 10, 2020 private mediation session. The parties have fully executed a term sheet specifying the general contours of the proposed settlement.

The parties respectfully request that the Court continue to hold Defendants' deadline to file opposition papers to Plaintiffs' conditional certification motion, as well as Plaintiffs' deadline to file their reply brief in abeyance for an additional 30 days as the parties are still in the process of finalizing the agreement.

This is the fourth request for a stay of the current briefing deadlines.

Thank you for your consideration of this matter. Please let us know if you have any questions or require any further information.



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Respectfully submitted,
JACKSON LEWIS P.C.

/s/ Wendy J. Mellk

Wendy J. Mellk

cc: All parties (via ECF)